



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DGR
F. #2016R01326

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 23, 2023

By ECF

The Honorable Margo K. Brodie
Chief United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Herman Segal,
Criminal Docket No. 20-551 (MKB)

Dear Chief Judge Brodie:

The government writes in connection with the above-captioned matter, and with the consent of defense counsel, to respectfully request a forty-five day adjournment of the status conference currently scheduled for March 24, 2023 at 10:00 a.m.

Since the parties' last status report, the government has produced additional discovery relevant to charged and uncharged conduct in this case. In addition, defense counsel has informed the government that they intend to produce reciprocal discovery to the government. The information to be produced by the defense is relevant to the parties' ongoing plea negotiations. Given those ongoing negotiations and the need for additional time to review the information received by the defense and the government, the parties jointly request an adjournment of this matter for forty-five days. Additionally, with the consent of defense counsel, the government also asks the Court to exclude time under the

Speedy Trial Act through the new status conference date, which exclusion is in the interests of justice.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/Drew G. Rolle
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cc: James Mahon, Esq. (Counsel to the defendant) (by ECF)
Samantha Lesser, Esq. (Counsel to the defendant) (by ECF)